



Department of Energy

ROCKY FLATS FIELD OFFICE
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JUN 14 2000

00-DOE-02681

Mr Steve Gunderson
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr Gunderson

During the past several months, a number of discussions and walkdowns have occurred with the Colorado Department of Public Health and Environment and the Department of Energy staff members regarding completion of Decontamination and Decommissioning Worksets in Building 771. As work has progressed, it has become evident that it is necessary to deviate from some of the specific Set Description and Major Endpoints found in the Building 771/774 Decommissioning Operations Plan (DOP), Appendix 9, Set Descriptions, End Points, and Hazards Matrix.

The purpose of this letter is to document agreements reached during the aforementioned discussions and walkdowns regarding deviations in the following workset endpoints. Field Modification No 2 to the B771/774 DOP is attached describing these changes. If you have any questions regarding this activity, please call me at (303) 966-5918.

Sincerely,

Joseph A Legare
Assistant Manager
for Environment and Infrastructure

Attachment

cc w/Att
P Golan, OOM, RFFO
H Dalton, AMFD, RFFO
M McCormick, FCG, RFFO
R DiSalvo, OCC, RFFO
J Springer, FCG, RFFO
K Trice, K-H
R Leitner, K-H
D Kruchek, CDPHE
T Rehder, EPA
Administrative Record



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B771-A-000114

May 25, 2000

FIELD MODIFICATION NO 2 – Building 771/774 Closure Project Decommissioning Operations Plan, Revision 0, December 7, 1998

This Field Modification to the Building 771/774 Decommissioning Operations Plan (DOP) is being transmitted to document the understanding that was reached between DOE/RFFO and CDPHE regarding deviations in the following completed workset major endpoints

Set Number	Set Title	Major Endpoints Deferred	Justification/Explanation
35	147 Office Area	* Drain/dispose water windows in rooms 140B, C, D, E, 147B, C and D	This activity was deferred because it was determined that removal of these windows would change ventilation flow and could create a path for contamination spread between Rooms 140, 146, and 149. It is anticipated that these windows will likely be drained and removed with Set 75.
41	Room 186 Process Area	*Remove/dispose material from sump (Raschig rings) in room 187	It was determined that the sump should remain in place for potential future use. In addition, the size reduction tent and supporting Continuous Air Monitors will remain in Room 186 for continued use in support of Building 771 D&D activities. The sump will likely be removed with Set 76 (Utilities All).
42	180 Office Area	N/A	There are no Major End Points associated with this Set in the DOP. However, the Set Description includes "cabinets and office furniture" which implies all cabinets and office furniture will be removed. One table and one chair will remain in Room 180I for building personnel to use when completing paperwork associated with D&D activities in the area. Additionally, four chairs will remain in Room 180J for personnel to use to "cool down" when working in extensive personnel protective equipment. This equipment will likely be removed with Set 76 (Utilities All).
44	Room 179 Maintenance Area	*Remove/dispose machine tools *Remove/dispose hot tool storage cabinet	Several pieces of equipment will remain for use during future D&D activities. This equipment includes a mechanical Arbor Press, two metal storage cabinets, and a metal cage containing certified hoisting and rigging equipment. This equipment will likely be removed with Set 76 (Utilities All).
46	146 Lab Area	*Remove/dispose miscellaneous lab equipment *Remove/dispose material from sump (Raschig rings) in room 161	It has been determined that the Personnel Decontamination Shower associated with the sump in Room 161 may be required for future use, so it will remain in place. Additionally, one argon gas bottle will remain in Room 156, one argon gas bottle will remain in Room 154 and one argon and one helium gas bottle will remain in Room 162. These gas bottles are required for ongoing equipment calibration. This equipment is will likely be removed with Set 76 (Utilities All).

Set Number	Set Title	Major Endpoints Deferred	Justification/Explanation
50	158 Lab Area	*Ensure sanitary drains (sinks) are isolated in room 168	It has been determined that the sump, sink, and piping in Room 168 will remain for transferring liquids to Building 774. This equipment will be removed with Set 76 (Utilities All). In addition, various equipment used by Radiation Control Technicians will remain in Room 166A for continued use. This equipment will likely be removed with Set 75.

FINAL ROCKY FLATS CLEANUP AGREEMENT

To initiate a major modification to work being done pursuant to an IM/TRA, DOE shall submit a request in writing with appropriate justification not less than 30 days prior to when DOE desires to execute or begin to execute the proposed changes. The LRA shall review such request and approve it, or deny it with explanation, in writing within 21 days after its receipt. To initiate a minor modification to work being done pursuant to an IM/TRA, DOE shall submit a written request to the LRA with appropriate justification not less than 21 days prior to when DOE desires to execute or begin to execute the proposed changes. The LRA shall review such request and approve it or deny it with an explanation in writing within seven days after its receipt.

To make a major modification to work being done pursuant to a CAD/ROD, DOE shall submit a written request, accompanied by appropriate justification, to the LRA not less than 90 days prior to when DOE desires to execute or begin to execute the changes. Concurrent with this submittal, DOE shall provide public notice of an opportunity for a 30 day public comment period regarding the modification. The LRA shall review such request and the public comments and approve the modification, or deny it with a written explanation, within 30 days after the close of the public comment period.

129. If DOE desires to modify an RSOP, it shall proceed through the document review process in paragraphs 112 or 113 and 114-115.

130. If DOE's Project Coordinator identifies the need to make a field modification for work being done under any type of decision document, she or he shall give verbal notice to the LRA's Project Coordinator within one day after making the modification, followed by a written justification within no more than seven days. While there is no formal requirement that the LRA approve field modifications, the LRA may discuss its concerns with DOE. If the LRA Project Coordinator requires a field modification, DOE and the LRA shall discuss the requirement and come to resolution within 24 hours from request for the field modification. Unless a stop work order is issued by the LRA, if the Parties do not come to agreement within 24 hours, the operations may continue pending dispute resolution pursuant to Part 15, Subpart F. If the agencies fail to reach agreement, the LRA's Project Coordinator may issue a Stop Work Order against further action on the modified work within seven days of receipt of the notification of any such modification based on a finding that the modification is resulting or will result in work being done that is (a) inadequate or defective, (b) likely to have a substantial adverse impact on other response action selection or implementation processes, (c) not within the parameters of a field modification, but rather is a minor or major modification, or (d) likely to significantly affect cost, scope, or schedule and requires further evaluation.

131. DOE will be the primary Party responsible for initiating the change process and providing sufficient time and documentation to demonstrate to the LRA's reasonable satisfaction that the proposed modification(s) or revision(s) is (are) necessary to accomplish the activity. The LRA will be responsible for internal consultation and for collecting, consolidating, and reconciling comments within the allotted time frames. During the time allotted for the LRA to respond to a proposed modification that requires approval, the DOE and LRA Project Coordinators should meet to resolve any potential barriers to approval. If agreement is reached, DOE will submit a revised proposed modification and will implement the same in accordance with this Agreement.